

HARMONISED
CODE OF CONDUCT
FOR MEMBERS OF THE LAGOS CIVIL SOCIETY
PARTICIPATION FOR DEVELOPMENT (LACSOP)

DECEMBER 2023

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Why a Code of Conduct

Civil Society Organisations play an increasingly influential role in promoting social and economic development and change around the world. In many cases, CSOs have played a prominent role in influencing local, national, regional, and international policy-formulation. They have, in certain instances, taken over roles and duties that traditionally belong to the government and have demanded high standards of transparency and accountability from elected governments; also have influenced in no small measure, local, national as well as international laws and treaties, as well as fought for and gained nomination into key international bodies and participate effectively in such positions. In addition, due to their watchdog status, CSOs have become key players in the democratic movement around the world. Unsurprisingly, the increased influence of CSOs in recent years has also raised the issue of transparency, legitimacy, accountability, and general good management practices on the part of CSOs themselves. In short and unarguably, it is believed that sizeable numbers of CSOs suffer from the problem of credibility.

Within the Nigerian context, Civil Society Organizations (CSOs) enrich lives across communities, regions, and ethnicity, playing an essential role in our society and economy. Through their work, they have created a wide spectrum of benefits to disadvantaged communities in areas such as health, education, nutrition, environment, civil rights, democracy, good governance, water and sanitation, women, and youth development amongst others.

Governments at the local and national levels have commonly raised the concerns about the proliferation of CSOs, the credibility and acceptability of some CSOs. It is therefore imperative for the CSOs wishing to engage with the state, donor partners and other stakeholders to set clear standards of accountability, credibility and transparency. Also, with individuals, corporations, foundations, multilaterals, and donor organisations supporting the work that nonprofits do, it is important to protect the time, resources and funds entrusted in our care. Doing this requires strengthening public confidence in the integrity, quality, effectiveness and delivery of our programmes and services.

The Code of Conduct will, amongst other things, improve partnership and trust between Nigerian Governments, donor agencies and CSOs by defining accepted and acceptable behaviour, help to promote high standards of practice as well as provide a benchmark for CSOs to use for self-evaluation. In addition, the Code of Conduct for Nigerian CSOs aims to raise the bar on the level of accountability, transparency and effectiveness of all civil society organisations operating in the country with a view to instilling excellence and inspiring trust, building on the fundamental values that hold the third sector together – honesty, integrity, fairness, respect, trust, compassion, responsibility, and transparency. As the work of civil society continues to dramatically increase in scope and significance, reinforcing the legal foundations of civil society management, governance and operations is an imperative.

Purpose

This Code has three main purposes:

1. To set out clearly the behaviour expected from CSOs, their board, and employees
2. To provide guidelines to help CSOs apply the sector's values - honesty, integrity, fairness, respect, accountability, trust, compassion, responsibility, and transparency.
3. To enable a CSO to raise a concern or ask a question where there is any doubt.

General Benefits of a Code of Conduct

The voluntary adoption and mainstreaming of a Code of Conduct by civil society organizations in Nigeria comes with huge benefits to the development sector and stakeholders, among which are:

- Strengthen internal governance structures to become more transparent and minimize the risk of improper conduct and corrupt influence.
- Build up reputations to increase acceptance of the state and other key stakeholders.
- Increase stakeholders' accountability via the reporting obligations and requirements.
- Communicate understanding and inclusion to stakeholders.
- Promote the essentiality for CSOs self-regulation in order to hold themselves accountable, while complying with external regulation delivered by the government.
- Prevent misconduct, legal, and regulatory breaches.
- Strengthen relationships with stakeholders by letting business partners and other third parties know what is expected of them upfront.
- Set boundaries, improve communication and become part of the CSO resilient communities.
- Engage employees and improve retention rates. Make employees feel included and understand the part they play in the organisation's mission.
- Build respect and improve public perception of CSOs in Nigeria.
- Develop and maintain a reputation for compliance and integrity by fulfilling their mandate.
- Encourage beneficiary/customer loyalty by conveying the organisation's values and high standards of conduct.

Guiding Principles

The Code has been developed as a set of good practices balanced with stakeholder expectations and statutory regulatory requirements representing shared accountability and expectations between critical stakeholders and the nonprofit community. It reflects the national and universal concerns about improving governance and management of resources among civil society organizations and embraces good practice in other sectors. The Code provides a common platform for CSOs across the country to assess their strength and to instill confidence in their beneficiaries and stakeholders that they are advancing the greater good through their operations and activities. It places a greater emphasis on values, accountability, transparency, probity, maintaining internal controls, leadership and the diversity of opinion and skills.

In pursuant of our aims and objectives as set out in this Code of Conduct, we shall be guided by the following principles and aspirations:

- a) **Contribute to** the common and social good; sustainable progress, peace and justice for all.
- b) **Commitment to** the sanctity of human life and to a peaceful and nonviolent orientation in all our activities.
- c) **Promotion of** democracy, human rights, the rule of law, good governance as well as justice for all the peoples of Nigeria.
- d) **Respect for** the equality, rights and dignity of all people including those under our influence and control.
- e) Foster social justice to ensure equality and balanced socioeconomic development.
- f) **Rejection of** partisan, political, ethnic, physical, cultural, racial or religious intolerance and all other forms of discrimination.
- g) Commitment to the promotion of gender equality and social inclusion at all levels.
- h) **Exhibition of** national interest that goes beyond the advancement of ethnic or partisan interests.
- i) **Maintaining** a culture of transparency and accountability particularly in the receipt and management of funds and avoiding corrupt and unethical practices.
- j) **Instilling** a culture of dialogue and sharing of resources, information, expertise and experiences.
- k) **Maintaining** a high standard of professionalism in service and interactions and dealing with people honestly and with full integrity.
- l) **Rejecting** research efforts, programmes, projects, and other activities which are directly or indirectly aimed at developing methods of torture, or other forms of techniques that violate and subvert people's and human rights.
- m) **Observing** clear guidelines on conflict of interest.
- n) **Fostering and maintaining** mutual trust, partnership and respect between CSOs, Nigerian Governments and donor agencies.
- o) **Protecting** everyone regardless of sex, age, gender identity, disability, , ethnic origin, or religion from all forms of harm, abuse, neglect, and exploitation.
- p) **Identifying and reporting** any breach or violation of the provisions of this Code to the Adherence Body.
- q) **Respect for** the autonomy, independence, and diversity of CSOs.

Audience

This Code of Conduct would apply to all CSOs, their Networks and Coalitions operating at national, sub-national and local community levels that are willing to seek accreditation with the Adherence Body, the Lagos Civil Society Participation for Development (LACSOP). The Code of Conduct is a set of standard and core values which civil society organizations, their networks and coalitions at all levels should adhere to set gold standards for CSO groups in Nigeria.

The Code would also be recommended for wider adoption and usage as a voluntary standard of self-regulation and governance by CSOs, their networks or coalitions as well as provide a benchmark for CSOs to use for self-evaluation.

Definitions

In this Code of Conduct:

AC	Advisory Committee of Civil Society National Self-Regulation Council
BC	British Council, Nigeria Country Office
CNSRC	Civil Society National Self-Regulation Council
CSOs	Civil Society Organisations legally operating in Nigeria
EU	The European Union Delegation to Nigeria and West Africa
GA	General Assembly of Civil Society National Self-Regulation Council
Governing Body	The Governing Body of Civil Society Organisations
NWG	National Working Group of Civil Society National Self-Regulation Council
SDGs	United Nations' Sustainable Development Goals
SNN	Civil Society Sub-National Networks
The Code	Code of Conduct for Civil Society Organisations in Nigeria.
The Government	Government of the Federal Republic of Nigeria
The Network/Coalition	Civil Society Networks/Coalitions
The Organisation	Civil Society Organisations
USAID	The United States Agency for International Development
WE	All Nigeria Civil Society Organisations, Networks and Coalitions who are signatories to the Code

Revision Clause

Any part of the provisions of the Code shall be revised or amended, only by the vote of two-thirds majority of the General Assembly of Lagos Civil Society Participation for Development (LACSOP).

The Code of Conduct

01. Organizational Purpose:

i. Understanding the organisation's purpose helps to clearly articulate what the nonprofit is trying to achieve, what its main activities will be, programmes or services to provide, target audience and beneficiaries.

ii. At the point of formations are expected to clearly state their purpose (objects) as this determines how they are classified by the regulator or the nonprofit sub-types it can register with. Its purpose also sets it out for benefits such as tax exemptions. Nonprofits are formed to fulfill charitable purposes (objects), it is on this basis that they derive their non-governmental status. Trustees (Board), staff and members of the organisation have a responsibility to understand the organisation's purpose and be guided by this in the delivery of its vision and mission in effective and sustainable means.

02. Leadership:

i. Every CSO has in place responsible leadership shared by a management and a governing body that is accountable. To successfully achieve their vision and mission, CSOs depend on responsible leadership, shared between management and an independent board (trustees) that is clear about its role and responsibilities, providing clear strategic direction in line with the organisation's purpose (object).

ii. Board (trustees or directors) are in position of trust and must ensure that the CSO's resources are used transparently and responsibly in carrying out the mission of the organisation. Board leadership within nonprofits consists of volunteers committed to the vision and mission of the organisation with a clear demonstration of a deep understanding of the constituency that they serve. It is the role of the Board to determine and establish management policies and procedures that guarantee adequate human and financial resources are available for the day-to-day running of the organisation including, monitoring the use and allocation of resources in fulfilling its mission. Also, policies set out by the board (trustees) must address both paid employees and volunteers, establishing clear expectations, fair, meaningful, and effective performance evaluation.

iii. CSO should establish an executive leadership that supports the board (trustees) in carrying out the day-to-day operations of the organisation ensuring that financial and human resources are put to good use and that the nonprofit is on its way to a sustainable future while providing adequate information to the board.

03. Governing Body Effectiveness:

i. CSO board of trustees are the legal owners of nonprofits. In trust, they have a key impact on whether the organisation thrives or dies. The tone the board sets through its leadership, behavior, culture and overall performance is critical to the nonprofit's success. The board should be self-aware and work together as a team, with a diverse and appropriate balance of necessary skills and experience to continually improve the governance and operations of the organisation.

ii. CSO board (trustees) should work collectively and proactively with a diverse and appropriate balance of skills and experience to continually improve the governance of their organisation and ensuring a safe culture for everyone.

iii. It is important for nonprofits to have a rigorous approach to board (trustees or directors) recruitment, performance and development. Such board where members feel safe to suggest, question and challenge ideas and address rather than avoid difficult topics is the ideal should be encouraged. Nonprofits need capable trustees who work together as an effective team. Board meetings are especially important, as this is where trustees exercise their collective authority.

04. Legal Compliance:

“CSO board of trustee ensures the organisation meets its legal, regulatory and contractual obligations and any constitutional requirements. With the level of public trust CSOs enjoy, it is important that they comply with diverse array of legal and regulatory requirements. Periodically CSOs must review and address their regulatory and fiduciary concerns. One of the boards (trustees) fundamental responsibilities is to ensure that the organisation they govern operates in an ethical and legal manner. To continue to enjoy the trust that the public has given them, nonprofits have the moral obligation to go beyond legal requirements and embrace the highest ethical practices. The organisations board, staff and volunteers must act in the best interest of the nonprofit and not for personal interests or interests of third parties.”

i. CSOs shall be legally constituted in Nigeria by Federal, State or Local Authority. Nothing in this section shall violate section 40 of the 1999 Constitution of the Federal Republic of Nigeria (as amended) which states that every person is entitled to assemble freely and associate with other persons.

ii. CSOs shall operate under the terms set out in a written Constitution or any other such instrument (the Constitution/Bye-Laws), which amongst other things shall clearly articulate the organization's vision, objectives and organizational structure.

iii. The members of the apex governing body (often referred to as the board of trustees) must set high personal standards for themselves and others within the organisation; and shall govern the organisations in a fair, impartial and responsible manner.

iv. The apex governing body shall be the final approving authority for all policy statements and annual program of the organisation and shall, amongst other things,

put in place policies that determine the membership of the organisation, promote gender and minority equity and social inclusion.

05. Conflict of Interest:

i. The apex governing body shall establish clear and unambiguous guidelines, which shall serve the purpose of ensuring that the personal interests of the members and volunteers do not conflict with those of the organisation or influence or affect the performance of their duties. In dealing with complaints of misconduct, abuse of office or other irregularities leveled against any member, staff or volunteer of the organisation, the equitable principles of fair hearing shall apply.

ii. Each trustee shall disclose all potential and actual conflicts of interest, including each institutional affiliation he or she has that might possibly involve a conflict of interest (such as sitting on a board of another CSO with overlapping goals and missions). Such disclosure does not preclude or imply ethical impropriety.

iii. The governing body shall develop a written conflict of interest policy, which is applicable to the directors and to any staff and volunteers who have significant decision-making authority regarding the organisation's activities or resources, as well as relevant organisational partners.

iv. The governing body shall provide its members with the written conflict of interest statement, which should be signed by the individual at the outset of each term of service.

v. If a CSO has provision for making loans to members of the governing body, there shall be a policy describing how the loans operate. All loans or transactions with members of the governing body are to be included in the CSO's full financial reports and publicly disclosed.

vi. CSOs shall establish a policy regarding gifts to staff members, such as requiring that staff refuse all significant gifts connected with their position or turn them over to the organisation.

vii. Staff members shall refrain from using their official position, either regular or volunteer, to secure special privilege, gain or benefit for themselves.

06. Openness and Communication:

"The principles of openness, transparency and accountability shall be applied to all the affairs and activities of the organisation, whether with the government, the target population, donors and/or other stakeholders. The activities of the Organisation shall, upon request, be open and accessible to scrutiny by its respective stakeholders, except for personal matters, legal matters, and proprietary information, as provided by law. Open organisations are transparent about their work and their identity. They share relevant information responsibly with people, partners, and the public. This transparency allows others to engage in constructive dialogue and to participate in the

organization's work, so it can learn and improve. CSOs that embody transparency and openness not only strengthen their own work but also justify the trust and confidence put in them, and the civil society sector, contributing to the preservation of civic space”.

i. CSOs should ensure regular communication about its work; bearing in mind that open and effective communication helps to build trust, increases visibility and provides the opportunity for the organisation to engage with its beneficiaries and stakeholders. Furthermore, this opens the organisation to asking for and responding to feedback from its stakeholders. It helps nonprofits to truly demonstrate transparency and accountability when they are open and willing to use constructive feedback in retooling their practices and making necessary changes.

ii. CSOs should ensure public disclosure of their financial information as a demonstrable commitment to transparency that builds public trust.

iii. CSOs should provide members of the public, the target population, donors, and governments with accurate and adequate information about their activities, finances and other important information that can be disclosed within the limits of law.

iv CSOs should nurture the practice of sharing information, such as research outcomes, as part of advancing peer learning, co-creation, and collaborative engagements with other CSOs.

v. Nonprofit transparently communicates its mission and accomplishments and seek feedbacks from people affected by its work, partners, volunteers, and staff.

07. Management Practices:

“CSO management should comprise of qualified and committed staff and volunteers; people who have the motivation and professional capacities to drive effective processes and achieve organizational purpose. Professional, well-equipped, and effective staff and volunteers improve the quality of an organization's work and reduce risks of mismanagement. To achieve this, CSOs must have transparent and fair principles, policies and procedures for recruiting, developing and managing staff. By including staff and volunteers in planning and decision-making processes, CSOs will create empowering environments in which individuals can effectively perform and grow”.

i. CSOs should adopt sound management practices, which shall take into account and consideration its vision, objectives and organizational structure.

ii. CSOs should develop and maintain well-articulated, fair and just policies and guidelines to deal with human resources (including volunteers) of the organization.

iii. CSOs should endeavor to establish training and educational programmes in support of this Code in order to ensure that its underlying values and expectations become fully integrated into the organisation.

08. Gender Equality and Social Inclusion:

“The beauty of civil society is in its diversity, serving as the cornerstone for nonprofits as they serve people and communities across different cultures, backgrounds, and abilities. With the support for CSOs coming directly or indirectly from the public, being representative and inclusive of the population it serves is key to maintaining public trust, supporting organizational sustainability and fostering effectiveness. CSOs are strong when they include a variety of experiences, perspectives and skills in their governance, programmes, projects, and operations”.

- i. CSOs should develop and actively assess their policies, plans, procedures, as well as board and staff composition to ensure they are inclusive. CSO administrators should establish and implement an organization-wide strategy or plan that addresses gaps identified in the assessment and promote a culture that demonstrates practices of diversity, equity and inclusion for board, staff and volunteers, and program participants.
- ii. CSOs should not discriminate against any person in terms of race, gender, religion, disability, and ethnicity.

09. Finance Management and Accountability:

CSOs acquire and use financial and other resources in ways that aligns with the organization’s values and purpose in an efficient, effective and ethical manner. To fulfil their purpose (object), CSOs must successfully navigate through different kinds of economic circumstances and be able to demonstrate a healthy financial management to their donors and critical stakeholders. The efficient, effective, and ethical use of financial and other resources is essential for CSOs to manage programs, achieve results and to develop and justify trust from stakeholders. Sound financial management starts with the organisation acquiring their resources ethically and using them in a way that reflects its values, realizes their purpose, curbs waste, and brings about lasting impact. To achieve this, CSOs must follow generally recognised accounting standards and principles, implement strict financial controls, and reduce the risk of misuse of funds. The board (trustees) is responsible and accountable for the financial management of the organisation and should ensure sound financial and operational systems in place and that accurate records are kept. It is also the board’s role to ensure that the CSO conducts periodic reviews to address accuracy and transparency of financial and operational reporting and put in place adequate safeguards to protect the integrity of the reporting systems.

- i. CSOs should exercise caution in their fundraising efforts, recognizing the need to maintain their independence and credibility. There shall be openness, honesty and transparency exhibited in the fundraising process, expenditure and accounting for the funds.
- ii. CSOs’ governing body or its designated authority should be responsible to approve and monitor the annual budget of the organisation and to ensure that acceptable and sound financial accounting practices is employed.

iii. CSOs should ensure financial prudence on the expenditure of the finances of the organisation.

iv. CSOs should not tolerate any improper influence, bribery or other unethical behaviour by their staff, volunteers, suppliers/vendors or other stakeholders.

v. The apex governing body should ensure that the account of the organisation is audited annually by independent professional auditors and that the results are made accessible to all the stakeholders.

vi. CSOs should strive towards the attainment of self-reliance rather than continued dependence on donor aid or charity.

10. Safeguarding:

Everyone with whom CSOs come into contact, regardless of sex, age, gender identity, disability, , ethnic origin, or religion, has the right to be protected from ALL FORMS of harm, abuse, neglect, and exploitation. CSOs are to be committed to providing a healthy and safe working environment that protects children and vulnerable persons from any harm that may be caused due to their encountering with their organisation directly or indirectly through suppliers or other subcontractors. This protection includes harm arising from the conduct of staff or personnel associated with the CSO and the design and implementation of the CSO's projects and activities.

i. CSOs should take appropriate steps to protect people in the organisation, or those it comes into contact with, from abuse and maltreatment of any kind, in essence taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

ii. CSOs should establish a do-no-harm policy in their respective organisations.

iii. CSOs should periodically conduct self-assessment on safeguarding. Where there is no safeguarding policy in place, an organisation should adopt one to help in protecting its people from harm.

iv. CSOs should establish a robust child protection policy with adequate monitoring and feedback mechanism.

11. Bullying and Harassment:

Internal stakeholders of CSOs are entitled to work in an environment free from harassment in the form of bullying, intimidation, discrimination, coercion, and other such improper behaviours which may interfere with good working conditions or career advancement. Any and all such improper conduct should not be tolerated as well as unwelcome remarks or conduct that could be considered by an impartial third party to

be provocative, demeaning, humiliating, derogatory, or any other unacceptable behavior that fails to respect the dignity of a person.

i. CSO board of trustees, staff, volunteers, beneficiaries and partners should take the requisite “Course on Improper Conduct” or have a “Prevention of Bullying and Harassment Policy” in place.

ii. CSOs staff and volunteers should be encouraged to make use of whistle-blowing policy as reporting channels, and CSOs should take all necessary actions for their implementation and adherence, including disciplinary action.

12. Sexual harassment:

Sexual harassment refers to any sexual or gender-related behavior that is not desired by the person who is the recipient of it and that violates his or her dignity. Sexual behavioral norms vary across the world. Sensitivity to the local cultural context on these issues is essential.

i. CSOs should ensure all appropriate procedures to avert sexual harassment, exploitation, or abuse of its staff and to protect people and communities vulnerable to risk.

ii. Staff and associates of CSOs must act according to established accepted global human rights standards and regulations with regard to sexual conduct.

iii. While on duty and off duty, CSOs should ensure that any sexual activity with children (persons under the age of 18) regardless of the age of consent locally, incite or force a child to take part in activities of a sexual nature, whether he or she is aware of the act committed and irrespective of consent exhibited are highly prohibited. Misguided belief in the age of a child is not adequate justification or defence. This prohibition also covers pornographic activities (photos, videos, games, etc.) that involve sexual contact with the child, as well as acquiring, storing, or circulating documents of a pedophilic nature, irrespective of the medium used.

iv. Given the increased vulnerability of populations in defenseless situations of natural disasters or conflict, internal stakeholders are prohibited from engaging in sexual relationships with populations affected by crisis since such relationships are based on fundamentally unequal power dynamics and undermine the credibility and integrity of the work of local, national, or international networks and organisations.

v. CSOs staff and volunteers should never accept, solicit, or partake in the “buying” of or profiting from sexual services or trade of money, employment, goods, or services for sex, including sexual indulgences or other forms of humiliating, degrading or exploitative/manipulative behavior is forbidden.

vi. CSOs staff and volunteers should never exploit the helplessness of any target group in the context of development, empowerment, and humanitarian work, particularly women and children, or allow any person(s) to be put into compromising situations, and

when working with children, avoid actions or behavior which may constitute poor practice and never act in ways that may place a child at risk of abuse

vii. CSO should have a zero-tolerance policy to guard against exploitation or abuse of children and vulnerable persons or adults in any form by staff or associated personnel. When a staff or associate, has concerns or suspicions regarding sexual abuse or exploitation by a colleague or anyone else with whom they are working, they must be able to report such concerns through Whistleblowing Policy reporting channel. Any allegation regarding sexual harassment, exploitation, and abuse will be investigated and if substantiated, should result in disciplinary action.

13. Nonviolent, Drug and Abuse-free Workplace:

The manufacture, sale, distribution, possession, or use of unlawful controlled substances, including the abuse of medication and alcohol should not be associated with CSO stakeholders and businesses. This is strictly prohibited and is grounds for disciplinary action and possible legal action. Alcohol and illegal drugs should not be consumed during work hours.

i. CSO stakeholders are not expected to be under the influence of illegal, non-prescribed drugs, or alcohol while on business, also should ensure that when attending official events (conferences and evening events and representing their CSO), to remain professional conduct and network, represent or liaise during the entire event in a professionally acceptable manner.

ii. CSO staff and volunteers should not possess non-prescribed or illegal drugs at work; there is zero tolerance for being associated with illegal drugs. If they are found to be in such possession, the CSO reserves the right to formally report them to the police and terminate their employment. Whistleblower(s) are encouraged to report immediately to the individual's supervisor or the executive director, any staff found or suspected to be under the influence of non-prescribed or illegal drugs or is drunk at work.

iii. CSOs should not tolerate any acts or threats of violence committed by or against its staff, board members, trustees, members, partner organisations, or visitors on its premises at any time or while engaged in business with, or on behalf of the CSO, whether on or off associated premises. Internal stakeholders are strictly prohibited from carrying any unauthorized firearms or other weapons while on any work premises. Such acts are subject to disciplinary action.

14. Abuse of Power:

Abuse of power is defined as "The abuse or misuse of position or influence or failure to use proper discretion for personal benefit or to benefit another person. Abuse of power includes but is not limited to favoritism, nepotism, cronyism, corruption, bribery, and all forms of exploitation, including sexual." (Global Network of Civil Society Organisations for Disaster Reduction).

- i. CSOs should put adequate measures to prohibit any act in form of harassment, victimization, bullying, discriminatory, or unlawful use of authority.
- ii. CSOs should disallow the use of position to bind a staff's CSO legally, financially, or morally without authorization; or the use of position to enact favoritism, nepotism, or cronyism.
- iii. CSOs should put appropriate disciplinary measures to deal with misconducts such as stealing or embezzlement of funds and property, bribery & corruption, misuse of organization's property, and all forms of exploitation and abuse within the organisation.

15. Fraud and Corruption:

- i. CSO should be committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. Its reputation for maintaining lawful business practices should also be of paramount importance.
- ii. CSO should institutionalize and maintain a zero-tolerance policy towards fraud and corruption, recognizing that fraud is contrary to the fundamental values that exemplify a CSO's integrity, transparency, and accountability.
- iii. Fraud and corruption undermine organisational effectiveness. CSOs should develop strict disciplinary measures to deal with issues of fraud and corruption in the organisation.
- iv. CSO staff, beneficiaries and partners should on regular basis take training on "Anti-corruption and Bribery" as part of efforts to mainstream ethics and professional conduct in the organisation.

Implementation Procedures

Adherence Body

- i. The Lagos Civil Society Participation for Development (LACSOP) shall be responsible for the enforcement of the provisions of this Code.

Compliance Mechanism and Monitoring

- i. In respect of monitoring compliance to the Code of Conduct, the Compliance Monitoring Working Group (CMWG) of the Lagos Civil Society Participation for Development (LACSOP) shall be charged with the following responsibilities:
 - a. Ensuring effective monitoring and strict compliance with the provisions of the Code.

- b. Institutionalizing annual yearly audit system to assess signatories and compliance to this Code via site visits and other appropriate methodologies.
- c. Determining petitions and complaints brought before it about the breach or violation of any part of the Code.
- d. Appraise the performance of CSOs in compliance to the provisions of the code.
- e. Hearing petitions and complaints about the accreditation process itself.
- f. Creating awareness of the provisions of the Code and take steps to popularize its provisions, rendering assistance and explanations whenever required.
- g. Proposing amendments to the provisions of the Code.
- h. Any other responsibilities deemed appropriate.

ii. Any aggrieved CSO or any other person or group of persons, may file a complaint or petition before the Lagos Civil Society Participation for Development (LACSOP) with respect to a breach of the Code or file an appeal in relation to any aspect of the process and criteria for the accreditation of CSOs to the General Assembly applied to it.

iii. The Compliance Monitoring Working Group (CMWG) of the Lagos Civil Society Participation for Development (LACSOP) shall promptly consider and investigate all complaints and petitions brought before it, always adhering to the principles of fairness and justice particularly observing the need for full disclosure and to grant the Respondent an opportunity to respond.

iv. Where the petition or complaint is made against a member of the Compliance Monitoring Working Group (CMWG) of the Lagos Civil Society Participation for Development (LACSOP), that member shall not take part in the proceedings at which the complaint will be heard.

v. Where the Compliance Monitoring Working Group (CMWG) of the Lagos Civil Society Participation for Development (LACSOP) finds that the Respondent has violated the provisions of the Code, or finds that the complaint laid against the process of accreditation process applied to it is inappropriate, it shall have the power to take any of the following measures:

- a. Educate or counsel the Respondent.
- b. Reprimand the Respondent.
- c. Make an Order requiring the Respondent to take certain remedial steps within a stipulated period of time.
- d. Suspend or terminate the accreditation of the Respondent-CSO.
- e. Redress the wrong done to the CSO seeking accreditation or grant the specific redress sought by it.
- f. Take any other appropriate action.

vi. Where the Compliance Monitoring Working Group (CMWG) of the Lagos Civil Society Participation for Development (LACSOP) finds that the Respondent has not violated or is not in breach of the provisions of the Code, it shall have power to take any of the under-listed steps:

- a. Exonerate the Respondent.
- b. Order the Complainant/Petitioner to render a public apology or
- c. Take any other action deemed appropriate by the Compliance Monitoring Working Group (CMWG) of the Lagos Civil Society Participation for Development (LACSOP).

Appendices

- i. Pre-Adoption Surveys
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